

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
Case No.**

| | | |
|--|---|----------------------------|
| TACHO M. SANDOVAL, |) | |
| an individual, |) | |
| |) | |
| Plaintiff, |) | COMPLAINT |
| |) | |
| vs. |) | |
| |) | |
| |) | Jury Trial Demanded |
| JOHN DOE No. 1, a/k/a “Fullest_Disclosure”, |) | |
| an individual; |) | |
| JOHN DOE No. 2, a/k/a “MoMoneyRules”, |) | |
| an individual; and |) | |
| JOHN DOE No. 3, a/k/a “Cartman_3_16”, |) | |
| an individual, |) | |
| |) | |
| Defendants. |) | |
| |) | |

COMPLAINT FOR DEFAMATION

Plaintiff **TACHO M. SANDOVAL**, an individual and citizen of the State of New York, by and through his undersigned counsel, sues Defendants John Doe No. 1, a/k/a Fullest_Disclosure, (“Fullest_Disclosure”), a citizen of the State of North Carolina, John Doe No. 2, a/k/a MoMoneyRules (“MoMoneyRules”), and John Doe No. 3, a/k/a Cartman_3_16 (“Cartman_3_16”) (collectively, the “Defendants”), and alleges:

NATURE OF THE ACTION

1. This is an action brought against three (3) anonymous internet posters for the defamatory and injurious statements they have each published on the internet message board called Investorshub.com (“iHub”) in a sub-category for messages about the company Clean Coal Technologies, Inc. (“CCTC” or “CCTI”), that falsely denigrate the basic integrity and character of

Plaintiff Tacho Sandoval's business and person. Collectively, the Defendants have falsely broadcast that Mr. Sandoval has "been sanctioned by the SEC for Trading 'irregularities'," that he "has a documented history of SEC Violations with settlements," that he "was suspended by SEC," and that he "dump[ed] 3m shares" thereby participating in a "fraudulent scheme" to manipulate the stock price of CCTC, *e.g.*, referred to by one of the posters as "that little paid pump." *See infra*. These statements of fact are false, defamatory, published without privilege or authorization, and have actually and proximately caused Mr. Sandoval injury. Indeed, Mr. Sandoval has never held a trading license with, been investigated or charged by, or entered any form of plea or consent order with, the U.S. Securities and Exchange Commission ("SEC"). He has never "dumped" or participated in any form of share or stock market manipulation in connection with his holdings in CCTC. Mr. Sandoval has never been found to have committed any form of fraud, entered any plea or consent order acknowledging his commitment of any form of fraud or other wrongdoing in connection with any SEC action. Mr. Sandoval is the victim of a ruthless and reckless cyber-smear campaign carried out against him by each of the Defendants posting under the cover and presumed protection of anonymity on the internet.

JURISDICTION AND VENUE

2. This Court has jurisdiction over this action pursuant to 28 U.S.C. § 1332 based upon the diversity of citizenship of the parties and because the amount in controversy exceeds \$75,000.00. Plaintiff Sandoval is a citizen of the State of New York. One of the anonymous "Doe Defendants" is, upon information and belief, a resident of Wake Forest, and a citizen of the State of North Carolina. As described below, Plaintiff has no knowledge regarding the identity or citizenship of John Doe Nos. 2 and 3, MoMoneyRules and Cartman_3_16, at this time. Thus, the Plaintiff will

amend the Complaint after he confirms the identity of Fullest_Disclosure, and after he ascertains the true identities of the two remaining Doe Defendants provided that an appropriate basis for federal subject matter jurisdiction exists with respect to each such John Doe Defendant.

3. Venue is proper in this District because, upon information and belief, at least one of the Defendants is a resident of this judicial district, and because a substantial part of the events or omissions giving rise to the claim happened in this District.

4. All conditions precedent to commencing this action have occurred, been performed, or have been waived.

THE PARTIES

5. Plaintiff **TACHO M. SANDOVAL** is an investor and citizen of the State of New York. At all relevant times, including the times during which each of the false and defamatory statements identified herein was published, Mr. Sandoval was a citizen of New York state.

6. John Doe No. 1 a/k/a “Fullest_Disclosure” is sued under a fictitious name, because the true identity and capacity of this Defendant, though suspected, is not fully known, nor corroborated by the Plaintiff to a degree that he can be identified in this pleading at this time, except by the fictitious name, alias, and pseudonym “Fullest_Disclosure” used as a screen name to post messages on the message boards for CCTC on iHub. Plaintiff has conducted substantial due diligence and investigation such that he holds a reasonable and good faith belief in the identity of Fullest_Disclosure in support of Plaintiff’s allegation that Fullest_Disclosure is a resident of Wake Forest, and a citizen of the State of North Carolina. Upon information and belief, Fullest_Disclosure is responsible in some manner for the occurrences alleged herein, and the Plaintiff’s damages as alleged herein were proximately caused by the conduct of Fullest_Disclosure. The Plaintiff will

amend the Complaint after he corroborates the true identity of Fullest_Disclosure provided that an appropriate basis for federal subject matter jurisdiction exists with respect to such John Doe Defendant.

7. John Doe No. 2 a/k/a “MoMoneyRules” is sued under a fictitious name, because the true identity and capacity of this Defendant is unknown to the Plaintiff, except by the fictitious name, alias, and pseudonym “MoMoneyRules” used as a screen name to post messages on the message boards for CCTC on iHub. Upon information and belief, MoMoneyRules is responsible in some manner for the occurrences alleged herein, and the Plaintiff’s damages as alleged herein were proximately caused by the conduct of MoMoneyRules. The Plaintiff will amend the Complaint after it ascertains the true identity of MoMoneyRules provided that an appropriate basis for federal subject-matter jurisdiction exists with respect to such John Doe Defendant.

8. John Doe No. 3 a/k/a “Cartman_3_16” is sued under a fictitious name, because the true identity and capacity of this Defendant is unknown to the Plaintiff, except by the fictitious name, alias, and pseudonym “Cartman_3_16” used as a screen name to post messages on the message boards for CCTC on iHub. Upon information and belief, Cartman_3_16 is responsible in some manner for the occurrences alleged herein, and the Plaintiff’s damages as alleged herein were proximately caused by the conduct of Cartman_3_16. The Plaintiff will amend the Complaint after it ascertains the true identity of Cartman_3_16 provided that an appropriate basis for federal subject-matter jurisdiction exists with respect to such John Doe Defendant.

STATEMENT OF FACTS

9. Mr. Sandoval has **never** been investigated or charged by, or entered any form of plea or consent order with, the SEC for any crime or misconduct including fraud.

10. Mr. Sandoval has never been charged by the SEC with any form of trading violation, nor entered any plea, consent order, or other form of settlement agreement agreeing or acknowledging that he committed or participated in any form of fraud or other wrongdoing in any SEC action.

11. Mr. Sandoval is an investor in CCTC. However, Mr. Sandoval has never participated in any form of securities fraud in connection with his holdings in CCTC, including but not limited to that form of stock price manipulation commonly referred to as a “pump and dump” according to which a shareholder artificially inflates the price of a stock through false and misleading positive statements, in order to sell his shares at the inflated price.

12. Mr. Sandoval has never “dumped” any CCTC shares, let alone millions of CCTC shares.

13. Notwithstanding the fact that the following postings were made anonymously on an internet message board, the reasonable reader of these postings would have believed that the following statements were conveying facts about Mr. Sandoval – not merely the opinion of the author. These asserted but false facts are defamatory *per se* to Mr. Sandoval.

DEFAMATORY POSTINGS ON INVESTORSHUB (iHUB)

A. False and Defamatory Postings by Fullest_Disclosure

14. On November 4, 2019, Fullest_Disclosure posted a message on the iHub message board account for the subcategory of posts pertaining to CCTC, at 12:30 p.m. entitled “#’s R Not Opinions!” wherein he states, *inter alia*:

Every day the 52 week hi gets lower because of the [b[SEC Violating Insider Investor Tacho Sandoval's fraudulent scheme[/color] buying CCTC shares at[b[11¢ then 30¢[/color] on the same day, ONLY to hold back reporting

the 30¢ transaction to time it with CCTI Leadership elaborate November 17, 2018 / q3 2018 stock manipulations with paid promotions, paid Press Release financial press syndications, published video promos, etc. . . . it's a penny hype stock that is run by guys that take money from Insiders like Tach Sandoval, Fife, etc. that have documented histories of SEC Violations, SEC Settlements, Fraud, with many, many, current and past holdings that run just under the Insider Reporting regulations...WHY??? To manipulate... Like I said...Tach Sandoval Invesot SEC Violator, Tacho San Doval Trader that was suspended by SEC for SEC Trading Violations Fraud, etc. is dumping his CCTC... He had 18m now he has 15m...WHY?

See **Ex. A**, Nov. 4, 2019 #54490 Fullest_Disclosure Post on iHub, CCTC Message Board, a copy of which is attached hereto and incorporated herein by reference.

15. The overall theme and conclusion of the posting is false and defamatory in that it asserts that Mr. Sandoval has committed securities fraud by engaging in “stock manipulations” with the management of CCTC. *Id.* This false and defamatory conclusion is itself built upon a host of false and defamatory statements about Mr. Sandoval.

16. The title of the post itself makes clear to the public that the contents of this post are being held out as true facts, not merely statements of the author’s opinion. It announces to the entirety of the reading audience that “#’s” or in other words ‘numbers’ “are Not Opinions!” *Id.* The posting then goes on to falsely allege that Mr. Sandoval bought shares in CCTC at 30 cents per share, and then deliberately held back the reporting of those purchases in order to manipulate the stock price of CCTC. In fact, Mr. Sandoval never purchased shares of CCTC for 30 cents per share. The post further asserts — falsely — that Mr. Sandoval had “18m” shares but “now he has 15m.” *Id.* The implication of the statement based upon its prior assertion is that Mr. Sandoval sold or ‘dumped’ some 3 million shares to manipulate the share price. But Mr. Sandoval was never engaged in any securities fraud or market manipulation and he never sold 3 million shares of CCTC. The very “#’s” which the post announces are not opinions, are false statements used to support the false and

defamatory claim that Mr. Sandoval is a criminal engaged in securities fraud.

17. Fullest_Disclosure expressly states, falsely, that Mr. Sandoval “was suspended by SEC for SEC Trading Violations Fraud etc. . . .” *Id.* As noted, Mr. Sandoval has never been suspended by the SEC for SEC trading violations and/or for fraudulent conduct. In fact, Mr. Sandoval has never been charged, convicted, nor plead guilty, nor acknowledged any form of wrongdoing in any action filed by the SEC. Similarly, contrary to the post’s assertion, Mr. Sandoval has no “documented histories of . . . SEC Settlements.” *Id.* The post falsely gives readers the belief that its assertions are based upon a long line of undisclosed, but substantial, convictions or misconduct involving “SEC Trading Violations” which simply and demonstrably is not true.

18. Each of the foregoing false assertions of fact impugns the basic character and integrity of Mr. Sandoval’s business as an investor, and impugns his character as a law abiding citizen by asserting, falsely, that he has been found by the SEC to have violated the securities laws, found to have committed crimes, and that he is currently engaging in such misconduct.

19. On November 5, 2019, Fullest_Disclosure posted a message on the iHub message board account for the subcategory of posts pertaining to CCTC, at 5:11 p.m. entitled ““INCOMING"!!!!!!” wherein he states, *inter alia*:

#TachoSqirts about to bail...started with dumping 3m shares ...incrementally he'll unwind before year end . . . TO knowingly promote this sham of a company run by scheming paid promoters hooked into SEC Violating FRAUDSTER Inside INVESTORS is borderline criminal...

See **Ex. B**, Nov. 5, 2019 # 54507 Fullest_Disclosure Post on iHub, CCTC Message Board, a copy of which is attached hereto and incorporated herein by reference.

20. The post is of and concerning Mr. Sandoval who is easily identifiable even through

the denigrating reference “#TachoSqrts.” *Id.* This post continues the false and defamatory assertion that Mr. Sandoval is participating in securities fraud through share price manipulation. Fullest_Disclosure here asserts that Mr. Sandoval’s alleged participation in such conduct “started with dumping 3m shares,” which is a false statement in that Mr. Sandoval has never sold 3 Million shares of CCTC, let alone deliberately sold any shares at an artificially high price that he helped to create, *i.e.*, *dumped*, CCTC shares. *Id.*

21. On November 8, 2019, Fullest_Disclosure posted a message on the iHub message board account for the subcategory of posts pertaining to CCTC, at 1:35 p.m. entitled “Nothing Positive, More 10Q Lies!” wherein he states:

CCTC’s idea of “important Investors” are investors that will break the law by violating SEC Regulations. Like Insiders Tacho Sandoval Investor who buys at inflated prices timed for paid pump promo manipulating the, yeah 30¢ (The 3Q 2018 High for last 10 years? Same Tacho Sandoval Insider that is on record for buying at 90¢ & 92¢ which makes absolutely no sense beyond more intentions for manipulations. It’s public that the jig is up with Tacho Sandoval as he’s dumped 3m.

See **Ex. C**, Nov. 8, 2019 # 54579 Fullest_Disclosure Post on iHub, CCTC Message Board, a copy of which is attached hereto and incorporated herein by reference.

22. As noted above, Mr. Sandoval never sold, let alone “dumped” 3 Million shares of CCTC. The assertion contained in the post that Mr. Sandoval has “dumped 3m” shares of CCTC is therefore false, as is the implication of the sentence that Mr. Sandoval’s asserted securities fraud has now come to light such that “the jig is up.” *Id.* The post is defamatory *per se*.

23. On December 3, 2019, Fullest_Disclosure posted a message on the iHub message board account for the subcategory of posts pertaining to CCTC, at 4:57 p.m. entitled “Commercial Misrepresentation” wherein he states, *inter alia*:

The only thin “Commercial” about CCTI is that it’s a fraud that has been perpetrated for over 20 yrs. by a few dozen SEC Violating, SEC Settling, and SEC Fraudsters that have gotten in bed with SEC Vilating, SEC Rules Breaking, and pink sheet investors with history's, documented, public, known to the world, of violating SEC LAws and/or taking 9.98% positions flying under the “Insider” regulations...for reasons.

That’s what’s Commercial. Commercial Grade, paid proms with pump schemes aligned with stock purchases and coordinated SEC Filing Violations executed by the like of Tacho Sandoval whose been sanctioned by the SEC for “irregularities”...taking positions on both sides when he was a gold trader, failing to file within regulated disclosure time frames. etc.

Yeah, his past with Dixie Brands, Kalyx, AAPC, etc. Reverse Merging deals winding up delisting NASDAQ concerns, etc.

This is Commercial Grade...what? SEC Violations!!!

What do we call that Commercial Fraud?!?!

See **Ex. D**, Dec. 3, 2019 # 54803 Fullest_Disclosure Post on iHub, CCTC Message Board, a copy of which is attached hereto and incorporated herein by reference.

24. The foregoing post is false and defamatory *per se* because again, Fullest_Disclosure is falsely asserting that Mr. Tacho Sandoval participated with CCTC in “pump schemes aligned with stock purchases and coordinated SEC Filing Violations.” *Id.* Mr. Sandoval has never participated in any form of securities fraud with CCTC through any stock manipulation, “pump and dump” scheme, or “coordinated SEC Filing” violation. *Id.* Fullest_Disclosure is again accusing Mr. Sandoval of criminal activity and securities fraud that never occurred and that denigrates Mr. Sandoval’s bussiness of investing and his character as a law abiding citizen. The post falsely asserts that Mr. Sandoval has been “sanctioned by the SEC” when he has never been sanctioned by the SEC. The assertion that the foregoing market manipulation constitutes “commercial fraud” is a false besmirschment of Mr. Sandoval’s business and character because it labels him as one who commits

illegal, fraudulent securities market manipulation.

25. On December 11, 2019, Fullest_Disclosure posted a message on the iHub message board account for the subcategory of posts pertaining to CCTC, at 3:52 p.m. entitled “Impeccable With Your Word and such...” wherein he asserts that “Tach as a trader before was charged and sanctioned (trading licenses suspended) from trading after breaking SEC Securities Laws. He paid thousands in fines.” *See* **Ex. E**, Dec. 11, 2019 # 54875 Fullest_Disclosure Post on iHub, CCTC Message Board, a copy of which is attached hereto and incorporated herein by reference.

26. As noted, this post, like the others by Fullest_Disclosure is false and defamatory because it falsely asserts that Mr. Sandoval “was charged and sanctioned (trading licenses suspended) from trading after breaking SEC Securities Laws,” when in fact, Mr. Sandoval has never been charged or sanctioned or suspended for “breaking SEC Securities Laws.” *Id.* These assertions place Mr. Sandoval’s business, reputation, and character in the worst of all possible lights.

27. Fullest_Disclosure made each of the foregoing posts with knowledge that the aforementioned statements were indeed false or with reckless disregard as to their truth or falsity.

28. Each of the foregoing statements exposes Mr. Sandoval’s business and his personal character to public contempt, ridicule, aversion, disgrace, and induces an evil opinion of him in the minds of right-thinking persons, thereby depriving him of their willingness to conduct business with him, to trust him, and to sociably interact with him as a law abiding citizen.

B. False and Defamatory Postings by MoMoneyRules

29. On September 3, 2020, MoMoneyRules posted a message on the iHub message board account for the subcategory of posts pertaining to CCTC, at 10:38 p.m. entitled “READCourt DOCS! Insider Sandoval Manipulated CCTS Stock!” wherein he states:

10%+ INSIDER Sandoval CCTC Stock Manipulation!

www.courts.state.ny.us/Reporter/pdfs/2020/2020_32252.pdf

Read the court records yourself. The whole few pages NOT just the ruling. It will reference how there has been stock manipulation by Insider Sandoval who had an agreement with his Partnership to disclose holding of more than 2% of the total. Yes, that was the main case ruling...Two River's said he violated his Partnership Agreement...which had disclose requirements. He got that dismissed.

...In the court records you'll see they found out about his CCTC SEC Filing Violations which is probably what then triggered Two Rivers to get him out. Some version of this. But the point is...and it's in the court docs...

Taco Sandoval has a documented history of SEC Violations with settlements going back almost 2 decades. He's an Insider holding more than 10% of CCTC so yeah...what is that? Shady.

Sandoval who had like almost 20% of CCTC...few million invested...Manipulated stock. in Oct.2018. Look at the history. A while back it was on this thread like weekly. Some advocate.

Search for Taco Sandoval and you'll see the whole story play by play in other Investorhub messages.
Shady.

See **Ex. F**, Sep. 3, 2020 # 58544 MoMoneyRules Post on iHub, CCTC Message Board, a copy of which is attached hereto and incorporated herein by reference. (Emphasis in original.)

30. Notwithstanding the fact that the September 3, 2020, MoMoneyRules post contains a citation and hyper-link that will take readers to the judicial opinion he purports to summarize, and notwithstanding the fact that the title of the article exhorts readers to "READCourt DOCS!", the September 3, 2020, MoMoneyRules post is both false and defamatory because it is neither a "fair" nor "true" description or summary of the factual findings contained in the underlying judicial order.

31. The hyper-link contained in the URL takes readers to a July 7, 2020 Order from a New York Supreme Court dismissing, with prejudice, claims brought against Mr. Sandoval by Two

Rivers Entities, LLC (the “Two Rivers Order”) at the motion to dismiss stage. *See Ex. J, Two Rivers Entities, LLC v Sandoval*, 2020 NY Slip Op 32252 U, Doc. # 656906/2019 (N.Y. Sup. Ct.) (Order dismissing complaint with prejudice), *appeal pending*, No. 2020-03167 (N.Y. App. Div.).

32. Contrary to the title and the content of MoMoneyRules’s September 3, 2020 post, the Court in the Two Rivers Order never concluded, found, or held that “Sandoval Manipulated CCTS Stock.” *See Ex. E*, Dec. 11, 2019 # 54875 Fullest_Disclosure Post on iHub, CCTC Message Board. Contrary to MoMoneyRules’s assertion in his post, the Two Rivers Order never concluded, found, or “reference[d] how there has been stock manipulation by Insider Sandoval” which MoMoneyRules further falsely alleges “was the main case ruling...” *Id.*

33. None of the foregoing statements by MoMoneyRules are even reasonably fair or true summaries of the actual content of the Two Rivers Order because in that Order, the Court does no more than to repeat the [false] allegations made by the Two Rivers Plaintiff against Mr. Sandoval before ultimately dismissing its claims. The Court did not rule that Mr. Sandoval had manipulated stock. The errors and misstatements in MoMoneyRules’s post are major and render the post substantially inaccurate. The post’s assertion that “Sandoval Manipulated CCTS Stock” creates an entirely different, disparaging, and damaging effect on the reader than does the actual truth that the Court, for purposes of deciding whether or not the Plaintiff stated a claim, merely repeated and, as required by the law, assumed the Plaintiff’s allegations to be true, simply for purposes of deciding the motion, without expressing any opinion as to its truth or falsity. Indeed, MoMoneyRules’s clear departure from the actual content of the Two River’s Order is indicative of the poster’s reckless disregard for the truth of his assertions and his intent to cause harm to the reputation and standing of Mr. Sandoval, *that is*, the poster’s actual malice in making and publishing the false posting.

34. MoMoneyRules further makes the definitively false and defamatory assertion that “Taco Sandoval has a documented history of SEC Violations with settlements going back almost 2 decades,” when in reality, Mr. Sandoval has no settlements with the SEC for any form or type of securities violation.

35. On September 16, 2020, MoMoneyRules posted another message on the iHub message board account for the subcategory of posts pertaining to CCTC, at 6:16 p.m. entitled “30¢ 52wkHi Manipulated by Inside Investor” wherein he states, *inter alia*:

10%+ INSIDER Sandoval CCTC Stock Manipulation!

. . . SEC Violating Insider Investor Tacho Sandoval’s fraudulent scheme buying CCTC shares at 11¢ then 30¢ on the same day, ONLY to hold back reporting the 30¢ transaction to time it with CCTI Leadership elaborate November 17, 2018 / q3 2018 stock manipulations with paid promotions, paid Press Release financial press syndications, published video promos, etc. . . .

There is NOTHING real about this company’s intrinsic value...it’s a penny hype stock that is run by guys that take money from Insiders like Tach Sandoval, Fife, Black Diamond, etc. that have documented histories of SEC Violations, SEC Settlements, Fraud, with many, many, current and past holdings that run just under the Insider Reporting regulations...WHY??? To manipulate...

Like I said...Tach Sandoval Invesot SEC Violator, Tacho San Doval Trader that was suspended by SEC for SEC Trading Violations Fraud, etc. is dumping his CCTC...

He had 18m now he has 15m...WHY? WHY is he exiting his Two River’s Trading under a cloud of CCTC Stock Manipulations concerns, investigations, etc.

Follow the MONEY!!!

Disclaimer: I am not a shareholder. I am NOT a short. I am NOT a tree hugger. I’ve been following these inside Investors and see many, many, moves that are questionable. Follow the money and ~~see fairly for public information~~ ~~My opinions are based o~~

See **Ex. G**, Sep. 16, 2020 # 58834 MoMoneyRules Post on iHub, CCTC Message Board, a copy of which is attached hereto and incorporated herein by reference. (Emphasis in original).

36. The foregoing post is defamatory and is chock full of false assertions. The title of the post itself is a false assertion of the same false content contained within the post, namely the assertion that Mr. Sandoval is involved in the illegal activity of manipulating the stock price of CCTC. The contents go on to denigrate Mr. Sandoval by falsely asserting that he is one of the few “Insiders” who have “documented histories of SEC Violations, SEC Settlements. . . .” *Id.* Each of these accusations is completely false because Mr. Sandoval has no documented history of SEC violations, he has never had a settlement with the SEC, and as noted, he has never been convicted, found guilty of, nor consented to any wrongdoing in connection with any securities fraud of any sort. These facts render equally false, and defamatory *per se*, MoMoneyRules’s assertion that Mr. Sandoval “was suspended by SEC for SEC Trading Violations Fraud”

37. MoMoneyRules’s attempt to insulate himself from liability through the self-styled “Disclaimer” is of no avail here and only enhances the force of the false representations contained in the post. The “Disclaimer” asserts that the poster’s “opinions are based on available public information,” but simultaneously gives the impression that the *factual statements* and inferences contained in the post are true, credible, and reliable because “I’ve been following these inside Investors” *Id.* As a result, the content identified above as defamatory *per se* cannot be deemed to fall within the contours of the purported “Disclaimer” because those assertions are all put forth as statements of fact that MoMoneyRules holds out as a basis for his ultimate opinion. For example, the post supports MoMoneyRules’s opinion that Sandoval is illegally “dumping” his shares and engaging in securities fraud with the seemingly factual – but false – assertion that Sandoval “was suspended by SEC for SEC Trading Violations Fraud.” *Id.* Indeed, the posting gives the distinct

impression that each of the [false] factual assertions therein is based upon a long but undisclosed history of SEC violations and convictions for Mr. Sandoval.

38. Further, Mr. Sandoval has never purchased shares of CCTC for 30 cents per share. Thus, the statement that Mr. Sandoval conducted a “fraudulent scheme” based in part upon buying shares for 30 cents per share too is completely false.

39. On September 21, 2020, MoMoneyRules posted yet another message on the iHub message board account for the subcategory of posts pertaining to CCTC, at 1:05 p.m. entitled FRAUD:CCTI SEC Violating INSIDERS!” wherein he states, *inter alia*:

HISTORY of FRAUD...(found this searching...posted in CCTC Board last year!)

NOT to mention Insiders Sandoval, Imeson, Fife SEC VIOLATORS

Finally, I’m see some rational discussion about the swarm of the known SEC VIOLATORS...

Taco Sandoval approx 20 million shares (10%+) SEC Trading Fraud, Suspended License, etc . . .

Like I’ve been saying...there is this recent LIST of inside influences that have histories of scamming, fraud, etc. Sandoval’s Q3 filing of a \$.30 share purchase that actually was transacted in January which timed to the 52 wk hi...was a fraud. ANOTHER SEC VIOLATION. . . .

See **Ex. H**, Sep. 21, 2020 # 58949 MoMoneyRules Post on iHub, CCTC Message Board, a copy of which is attached hereto and incorporated herein by reference.

40. The foregoing post is both false and defamatory *per se*. Despite the fact that Mr. Sandoval has no record or history of securities fraud with the SEC, the entirety of the post, starting with the title, communicates to the reader the false assertion Mr. Sandoval is committing fraudulent conduct in connection with CCTC, *i.e.*, “FRAUD:CCTI SEC Violating INSIDERS!” *Id.* Despite

these facts, MoMoneyRules describes Mr. Sandoval as having committed “SEC Trading Fraud” which Mr. Sandoval definitively did not.

41. Lastly, as with prior posts, MoMoneyRules again makes the demonstrably false assertion that Mr. Sandoval made a filing with the SEC claiming to have purchased CCTC shares for 30 cents per share, which is a false statement. MoMoneyRules then relies specifically upon this false assertion to accuse Mr. Sandoval of having committed the crime of “fraud.”

42. These are factually false, reprehensible assertions that MoMoneyRules made with knowledge that the statements contained therein were false or reckless disregard as to their truth or falsity. Each of the false statements, and the posts in full, expose Mr. Sandoval’s business and his personal character to public contempt, ridicule, disgrace, and induces an evil opinion of him in the minds of right-thinking persons, thereby depriving him of their willingness to conduct business with him, to trust him, and to engage with him sociably as a law abiding citizen.

C. False and Defamatory Postings by Cartman_3_16

43. On November 8, 2019, Cartman_3_16 posted a message on the iHub message board account for the subcategory of posts pertaining to CCTC, at 5:01 a.m. wherein he states:

As if “because it’s the law” has ever been management’s guiding force.

What a joke. They must think shareholders are morons, especially after that little paid pump they executed last fall with slimy insider Nacho Sandoval.

See **Ex. I**, Nov. 8, 2019 # 54571 Cartman_3_16 Post on iHub, CCTC Message Board, a copy of which is attached hereto and incorporated herein by reference.

44. The foregoing post by this anonymous poster is false and defamatory *per se*. The poster speculates as to what the company, CCTC, “must think” of the shareholders, but his

conclusion that CCTC apparently thinks the shareholders are “morons” is based upon a statement which he puts forth as a clear assertion of fact, which the reader is led to believe is supported by other evidence – namely, that “Nacho Sandoval” – an obviously racist and deprecatory reference to Mr. Tacho Sandoval (who is of Latin heritage) participated in illegal securities fraud with CCTC by manipulating the company’s price of shares through a “pump they executed last fall” *Id.*

45. Mr. Sandoval has never engaged in securities fraud with his CCTC shares, individually or with anyone else. Cartman_3_16 has made and published the damaging false statement with knowledge that the statement contained therein was false or reckless disregard for its truth or falsity.

COUNT I – DEFAMATION *PER SE*
(Against John Doe No. 1 a/k/a Fullest_Disclosure)
New York Law

46. Plaintiff Sandoval repeats and incorporates by reference each of the allegations set forth above in paragraphs 1 through 45 as if each of those assertions were set forth fully herein.

47. John Doe No. 1, the individual posting under the alias of Fullest_Disclosure, published a number of false and defamatory statements to third parties about Mr. Sandoval on that internet message board iHub.

48. John Doe No. 1 a/k/a Fullest_Disclosure published these statements without authorization or privilege.

49. John Doe No. 1 a/k/a Fullest_Disclosure was negligent as to the truth of these statements when he published them.

50. John Doe No. 1 a/k/a Fullest_Disclosure published each of the statements with knowledge that the statement was false or with reckless disregard as to the statement’s truth or

falsity.

51. Specifically, the false and defamatory statements published by John Doe No. 1 a/k/a Fullest_Disclosure are referred to and identified with particularity above in **(a)** paragraph 14 and set forth in **Ex. A**, Nov. 4, 2019 #54490 Fullest_Disclosure Post on iHub, CCTC Message Board, a copy of which is attached hereto and incorporated herein by reference, **(b)** paragraph 20 and set forth in **Ex. B**, Nov. 5, 2019 # 54507 Fullest_Disclosure Post on iHub, CCTC Message Board, a copy of which is attached hereto and incorporated herein by reference, **(c)** paragraph 23 and set forth in **Ex. C**, Nov. 8, 2019 # 54579 Fullest_Disclosure Post on iHub, CCTC Message Board, a copy of which is attached hereto and incorporated herein by reference, **(d)** paragraph 25 and set forth in **Ex. D**, Dec. 3, 2019 # 54803 Fullest_Disclosure Post on iHub, CCTC Message Board, a copy of which is attached hereto and incorporated herein by reference, and **(e)** paragraph 27 and set forth in **Ex. E**, Dec. 11, 2019 # 54875 Fullest_Disclosure Post on iHub, CCTC Message Board, a copy of which is attached hereto and incorporated herein by reference.

52. Contrary to the false and defamatory statements contained in each of the foregoing posts, Mr. Sandoval never engaged in any form of market manipulation with his CCTC shares, including the alleged “pumping” or “dumping” of his shares, either alone, or in concert with CCTC; he never purchased shares of CCTC at 30 cents per share; he never sold 3 Million shares of CCTC; he has never engaged in a settlement with the SEC; he has never been accused by the SEC of any form of wrongdoing, and has never entered a settlement with the SEC; he has never been suspended by the SEC for any reason, and never been found guilty or consented to any judgment or Order admitting wrongdoing for securities fraud.

53. Each of the foregoing statements exposed Mr. Sandoval’s business and his personal

character to public contempt, ridicule, disgrace, and induced an evil opinion of him in the minds of right-thinking persons, thereby depriving him of their willingness to conduct business with him, to trust him, and to sociably interact with him as a law abiding citizen.

54. As a direct and proximate cause of John Doe No. 1 a/k/a Fullest_Disclosure's intentional and malicious publication of the foregoing false statements, Mr. Sandoval's professional and personal reputations have been injured and continue to suffer in amount that will proven at trial.

55. As a direct and proximate cause of John Doe No. 1 a/k/a Fullest_Disclosure's intentional and malicious publication of the foregoing false statements, Mr. Sandoval has been forced to incur expenses in amount that will proven at trial.

WHEREFORE, Mr. Tacho M. Sandoval, by and through his undersigned counsel, respectfully request that this Court enter a judgment in his favor and against John Doe No. 1 a/k/a Fullest_Disclosure which:

- (A) Orders that John Doe No. 1 a/k/a Fullest_Disclosure shall pay Mr. Sandoval compensatory damages in an amount to be proven at trial;
- (B) Temporarily, Preliminarily, and Permanently Enjoins John Doe No. 1 a/k/a Fullest_Disclosure (and those persons in active concert or participation with him who receive actual notice of the injunction by personal service or otherwise) from publishing, directly or indirectly, false or defamatory information concerning Mr. Tacho Sandoval on any electronic bulletin board on the Internet, including, but not limited to, Investorshub.com, or through any other communication device, artifice, or contrivance;
- (C) Orders that John Doe No. 1 a/k/a Fullest_Disclosure shall cease and desist from the publication through any medium of any false and defamatory statements about Mr. Sandoval or his business;
- (D) Orders John Doe No. 1 a/k/a Fullest_Disclosure to remove all messages, postings, reports, or other publications of false or defamatory information concerning Tacho Sandoval on any electronic bulletin board on the Internet, including, but not limited to, Investorshub.com, or on any other communication device, artifice, or contrivance,

and, to ensure compliance with this aspect of the relief requested, denominate Investorshub.com as a Relief Defendant, if necessary, for the limited purpose of requiring it to remove and/or otherwise expunge all postings about Tacho Sandoval found to be false or defamatory; and

- (E) Awards Mr. Sandoval any other relief that the Court deems equitable, just, and proper.

COUNT II – DEFAMATION *PER SE*
(Against John Doe No. 2 a/k/a MoMoneyRules)
New York Law

56. Plaintiff Sandoval repeats and incorporates by reference each of the allegations set forth above in paragraphs 1 through 45 as if each of those assertions were set forth fully herein.

57. John Doe No. 2, the individual posting under the alias of MoMoneyRules, published a number of false and defamatory statements to third parties about Mr. Sandoval on that internet message board iHub.

58. John Doe No. 2 a/k/a MoMoneyRules published these statements without authorization or privilege.

59. John Doe No. 2 a/k/a MoMoneyRules was negligent as to the truth of these statements when he published them.

60. John Doe No. 2 a/k/a MoMoneyRules published each of the statements with knowledge that the statement was false or with reckless disregard as to the statement's truth or falsity.

61. Specifically, the false and defamatory statements published by John Doe No. 2 a/k/a MoMoneyRules are referred to and identified with particularity above in **(a)** paragraph 31 and set forth in **Ex. F**, Sep. 3, 2020 # 58544 MoMoneyRules Post on iHub, CCTC Message Board, a copy of which is attached hereto and incorporated herein by reference, **(b)** paragraph 37 and set forth in

Ex. G, Sep. 16, 2020 # 58834 MoMoneyRules Post on iHub, CCTC Message Board, a copy of which is attached hereto and incorporated herein by reference, and (**c**) paragraph 42 and set forth in **Ex. H**, Sep. 21, 2020 # 58949 MoMoneyRules Post on iHub, CCTC Message Board, a copy of which is attached hereto and incorporated herein by reference.

62. Contrary to the false and defamatory statements contained in each of the foregoing posts, Mr. Sandoval never engaged in any form of market manipulation with his CCTC shares, including the alleged “pumping” or “dumping” of his shares, either alone, or in concert with CCTC; he never purchased shares of CCTC at 30 cents per share; he never sold 3 Million shares of CCTC; he has never engaged in a settlement with the SEC; he has never been accused by the SEC of any form of wrongdoing, and has never entered a settlement with the SEC; he has never been suspended by the SEC for any reason, and never been found guilty or consented to any judgment or Order admitting wrongdoing for securities fraud.

63. Each of the foregoing statements exposed Mr. Sandoval’s business and his personal character to public contempt, ridicule, disgrace, and induced an evil opinion of him in the minds of right-thinking persons, thereby depriving him of their willingness to conduct business with him, to trust him, and to sociably interact with him as a law abiding citizen.

64. As a direct and proximate cause of John Doe No. 2 a/k/a MoMoneyRules’s intentional and malicious publication of the foregoing false statements, Mr. Sandoval’s professional and personal reputations have been injured and continue to suffer in amount that will proven at trial.

65. As a direct and proximate cause of John Doe No. 2 a/k/a MoMoneyRules’s intentional and malicious publication of the foregoing false statements, Mr. Sandoval has been forced to incur expenses in amount that will proven at trial.

WHEREFORE, Mr. Tacho M. Sandoval, by and through his undersigned counsel, respectfully request that this Court enter a judgment in his favor and against John Doe No. 2 a/k/a MoMoneyRules which:

- (A) Orders that John Doe No. 2 a/k/a MoMoneyRules shall pay Mr. Sandoval compensatory damages in an amount to be proven at trial;
- (B) Temporarily, Preliminarily, and Permanently Enjoins John Doe No. 2 a/k/a MoMoneyRules (and those persons in active concert or participation with him who receive actual notice of the injunction by personal service or otherwise) from publishing, directly or indirectly, false or defamatory information concerning Mr. Tacho Sandoval on any electronic bulletin board on the Internet, including, but not limited to, Investorshub.com, or through any other communication device, artifice, or contrivance;
- (C) Orders that John Doe No. 2 a/k/a MoMoneyRules shall cease and desist from the publication through any medium of any false and defamatory statements about Mr. Sandoval or his business;
- (D) Orders John Doe No. 2 a/k/a MoMoneyRules to remove all messages, postings, reports, or other publications of false or defamatory information concerning Tacho Sandoval on any electronic bulletin board on the Internet, including, but not limited to, Investorshub.com, or on any other communication device, artifice, or contrivance, and, to ensure compliance with this aspect of the relief requested, denominate Investorshub.com as a Relief Defendant, if necessary, for the limited purpose of requiring it to remove and/or otherwise expunge all postings about Tacho Sandoval found to be false or defamatory; and
- (E) Awards Mr. Sandoval any other relief that the Court deems equitable, just, and proper.

COUNT III – DEFAMATION *PER SE*
(Against John Doe No. 2 a/k/a MoMoneyRules)
New York Law

66. Plaintiff Sandoval repeats and incorporates by reference each of the allegations set forth above in paragraphs 1 through 45 as if each of those assertions were set forth fully herein.

67. John Doe No. 3, the individual posting under the alias of Cartman_3_16, published

a false and defamatory statements to third parties about Mr. Sandoval on that internet message board iHub.

68. John Doe No. 3 a/k/a Cartman_3_16 published the statement without authorization or privilege.

69. John Doe No. 3 a/k/a Cartman_3_16 was negligent as to the truth of this statement when he published it.

70. John Doe No. 3 a/k/a Cartman_3_16 published the statement with knowledge that the statement was false or with reckless disregard as to the statement's truth or falsity.

71. Specifically, the false and defamatory statement published by John Doe No. 3 a/k/a Cartman_3_16 is referred to and identified with particularity above in (a) paragraph 46 and set forth in **Ex. I**, Nov. 8, 2019 # 54571 Cartman_3_16 Post on iHub, CCTC Message Board, a copy of which is attached hereto and incorporated herein by reference.

72. Contrary to the false and defamatory statement, Mr. Sandoval never engaged in any form of market manipulation with his CCTC shares, including the alleged "pumping" or "dumping" of his shares, neither alone, nor in concert with CCTC.

73. Each of the foregoing statements exposed Mr. Sandoval's business and his personal character to public contempt, ridicule, disgrace, and induced an evil opinion of him in the minds of right-thinking persons, thereby depriving him of their willingness to conduct business with him, to trust him, and to sociably interact with him as a law abiding citizen.

74. As a direct and proximate cause of John Doe No. 3 a/k/a Cartman_3_16's intentional and malicious publication of the foregoing false statement, Mr. Sandoval's professional and personal reputations have been injured and continue to suffer in amount that will proven at trial.

75. As a direct and proximate cause of John Doe No. 3 a/k/a Cartman_3_16's intentional and malicious publication of the foregoing false statement, Mr. Sandoval has been forced to incur expenses in amount that will proven at trial.

WHEREFORE, Mr. Tacho M. Sandoval, by and through his undersigned counsel, respectfully request that this Court enter a judgment in his favor and against John Doe No. 3 a/k/a Cartman_3_16 which:

- (A) Orders that John Doe No. 3 a/k/a Cartman_3_16 shall pay Mr. Sandoval compensatory damages in an amount to be proven at trial;
- (B) Temporarily, Preliminarily, and Permanently Enjoins John Doe No. 3 a/k/a Cartman_3_16 (and those persons in active concert or participation with him who receive actual notice of the injunction by personal service or otherwise) from publishing, directly or indirectly, false or defamatory information concerning Mr. Tacho Sandoval on any electronic bulletin board on the Internet, including, but not limited to, Investorshub.com, or through any other communication device, artifice, or contrivance;
- (C) Orders that John Doe John Doe No. 3 a/k/a Cartman_3_16 shall cease and desist from the publication through any medium of any false and defamatory statements about Mr. Sandoval or his business;
- (D) Orders John Doe No. 3 a/k/a Cartman_3_16 to remove all messages, postings, reports, or other publications of false or defamatory information concerning Tacho Sandoval on any electronic bulletin board on the Internet, including, but not limited to, Investorshub.com, or on any other communication device, artifice, or contrivance, and, to ensure compliance with this aspect of the relief requested, denominate Investorshub.com as a Relief Defendant, if necessary, for the limited purpose of requiring it to remove and/or otherwise expunge all postings about Tacho Sandoval found to be false or defamatory; and
- (E) Awards Mr. Sandoval any other relief that the Court deems equitable, just, and proper.

JURY TRIAL DEMAND

Plaintiff Sandoval hereby demands a trial by jury, on all issues triable by a jury, pursuant to Rule 38(b) of the Federal Rules of Civil Procedure.

Dated: November 3, 2020

Respectfully submitted,

/s/ Carl F. Schoeppl

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*Special Appearance Counsel pursuant to Local
Civil Rule 83.1(e) for Plaintiff Tacho M. Sandoval
(Notice of Appearance to be submitted when case
number is assigned)*

/s/ Robert A. Meynardie

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